

**Franklin Road Groundwater Site
PRP RESPONSE SUMMARY**

Property of Interest	780 Brookside Drive, Spencer, Indiana 47460
Entity Name	Sally M. Vance
Entity Current Name	Karen Vance, daughter and agent through Power of Attorney to Sally M. Vance
Date of Response	6/6/2019
Respondent Name	Sally M. Vance
Respondent Title	Former Owner
Respondent Address	Karen Vance PO Box 532116 Indianapolis, Indiana 46253
Respondent Phone	317-357-9515 (Karen Vance)
Respondent Email	Not Provided
Attorney/Representative Name and Contact Information	Frank J. Deveau 317-713-3520 fdeveau@taftlaw.com
Firm Name and Address	Taft Stettinius & Hollister LLP One Indiana Square, Suite 3500 Indianapolis, Indiana 46204
Exemption/Defense Asserted (Which One?)	None
Additional Parties Identified?	Yes (underlined and bolded below)
Certified as True by Authorized Signature?	Yes
104(e) Response Summary	
<p>On April 22, 2019, the attorney for Sally Vance (the Respondent), Frank J. Deveau, requested the due date be extended to June 6, 2019. EPA approved this request. On June 6, 2019, the Respondent provided its formal response to the 104(e) Information Request letter dated April 2, 2019. Karen Vance, daughter and the Respondent's agent through Power of Attorney, completed the response on behalf of her mother. Karen Vance is the manager of <u>TBH, LLC</u>, the entity that currently owns the Property of Interest. The Respondent notes her response is nearly identical to the response from TBH, LLC. The following individuals were also consulted in preparation of this response:</p> <ul style="list-style-type: none"> • Charmaine Mullins-Jaime: CSP, CRSP, EHS Manager, Boston Scientific Corporation, 780 Brookside Drive, Spencer, Indiana, 812-821-8226; and • Frank J. Deveau, Taft Stettinius & Hollister LLC (legal counsel for TBH LLC and Sally Vance). <p>The Respondent refers EPA to <u>Boston Scientific Corporation</u> (Boston Scientific), a tenant at the Property of Interest since 1988, as an additional source of information. Boston Scientific provided a separate response to the 104(e) Information Request.</p> <p>The Respondent states she is a former owner of the Property of Interest. She and her husband, <u>James F. Vance</u>, owned the land and formed <u>Van-Tec, Inc.</u> to manufacture disposable urological products at the Property of Interest in the early 1980s. Van-Tec, Inc. leased the property from the Vances until it sold its business to Boston Scientific in 1988; Boston Scientific continued to lease the property from the Vances until 2004 when Mr. Vance died. Title to the property was transferred to <u>SMV Realty, LLC</u> in 2008 and then later to TBH, LLC in 2017. Boston Scientific continues to lease the Property of Interest from TBH, LLC.</p>	

**Franklin Road Groundwater Site
PRP RESPONSE SUMMARY**

Much of the remainder of the response is in reference to operations by Van-Tec, Inc. The Respondent notes that little is known about chemicals and cleaning material used when Van-Tec, Inc. operated at the property over 30 years ago, and there are no known records of operations for that period. To the best of the Respondent's knowledge, Van-Tec, Inc. did not handle hazardous materials and has no knowledge of releases or threatened releases of hazardous substances, pollutants or contaminants at the Property of Interest by Van-Tec, Inc.

According to a Phase I Environmental Site Assessment (attached with the response), Van-Tec, Inc. had an EPA Identification (IND 029 672 136), which Boston Scientific continued to use after buying the business from Van-Tec, Inc.

The original building at the Property of Interest, constructed in 1985, was 40,000 square feet (sq. ft.). The following four expansions were added to the building: 3,000 sq. ft. in 1987/88; 40,000 sq. ft. in 1991; 60,000 sq. ft. 1994/95; and 30,000 sq. ft. 1996. The Respondent believes that the only excavation done at the property was conducted in conjunction with the building expansion.

The Respondent has no first-hand knowledge of leaks, releases, or spills; however, it refers to a Phase I Environmental Site Assessment, dated November 29, 2018, that mentions multiple releases of electrolytic fluids, 'electro polish' and acetone to the sanitary sewer system in 1997 while Boston Scientific was the operator. The Phase I Environmental Site Assessment concluded it is unlikely that the releases pose a risk to the subject property.

The Respondent provided a multi-page document index for documents included in the response as well as privilege log. The enclosed documents included, among other items, property ownership and leasing records; maps and drawings; various reports (e.g., Phase I Environmental Site Assessment, and records relating to the building expansion.